



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

March 4, 2013

Mr. Jim Martinez  
Chevron Business and Real Estate Services  
145 South State College Boulevard, Suite 400  
Brea, California 92821

**Re: Birch Hills Golf Course in Brea, California,  
Southwest Golf Course Cleanup Goals**

Dear Mr. Martinez:

The U.S. Environmental Protection Agency, Region 9 (EPA) has reviewed Amendment #7, "*Risk Receptor Revisions*" submitted on April 26, 2012. This document was submitted by URS Corporation (URS) on behalf of Chevron Land and Development Company (Chevron).<sup>1</sup> Amendment #7 amends Chevron's November 18, 2011 "*Soil Management and Sample Analysis Plan*" ("SMSAP") and proposes risk-based screening levels ("RBSLs") to apply as cleanup goals in the Southwestern Golf Course portion of the site.

EPA has reviewed Amendment #7 and is hereby establishing alternate cleanup goals under the Toxic Substances Control Act ("TSCA") regulations in 40 CFR § 761.61(c) for a risk-based cleanup. In addition, this letter reflects the February 6, 2013 agreements ("Agreements") reached between EPA and Chevron/URS regarding the following cleanup goals for the Southwestern Golf Course portion of the site:

1. **Area-wide cleanup goal.** A cleanup goal of 0.74 mg/kg total PCBs in soils in the top 2 feet below final grade must be met throughout the Southwestern Golf Course. Compliance with this cleanup goal shall be demonstrated using 95% upper confidence limits on mean concentrations (95% UCL) calculated using the current version of EPA's Pro-UCL software.
2. **Maximum concentration for individual samples.** Any volumes of soil represented by samples exceeding 7.4 mg/kg total PCBs must be excavated and disposed of based on as-found concentrations. Further sampling to determine the extent of contamination, and removal following a standard excavation procedure must be completed consistent with the Agreements, summarized in the attached February 8, 2013 email message to Chevron/URS ("*PCBs: Birch Hills Golf Course Site, Brea, CA – Agreements Reached on February 6, 2013*").

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<sup>1</sup> Chevron is supporting the site owner, Birch/Kraemer LLC, on the PCB cleanup.

In general, soils with PCB concentrations greater than 7.4 mg/kg will be excavated in a 30 x 30 foot square, with step-out and confirmation samples being taken on both the sidewalls and excavation floor.

3. **Spatial distribution of contamination.** EPA will use this information to determine whether the spatial distribution of residual total PCB concentrations does not suggest that any areas of the site meaningfully exceed the cleanup goal of 0.74 mg/kg total PCBs. Compliance with the 0.74 mg/kg cleanup goal will also be demonstrated using the 95% UCL. To provide EPA with a basis to evaluate spatial distribution of residual concentrations of total PCBs in near-surface soils (up to 2 feet below final grade) at the site, Chevron/URS must provide EPA with maps and tables that clearly depict the soil sample locations, depths, and residual PCB concentrations.

Chevron/URS intend to focus their remedial efforts in the Southwestern Golf Course to the top 5 feet of soils, as documented in Issue #1 of the February 8, 2013 message. However, due to the size of the Site and resource constraints, much of the soil deeper than the top 2 feet of soil below final grade will be left in place without thorough characterization. As such, EPA may require that the cleanup goals be met at other depth intervals or Southwest Golf Course locations due to golf course infrastructure activities. Chevron/URS has acknowledged the need for land use restrictions and a soil management plan to be developed for soils that are either not fully characterized or that do not meet the cleanup goals. This Approval does not cover these issues, and EPA will work with Chevron/URS to resolve them.

This approval does not relieve the site owner, Birch/Kraemer LLC, and supporting companies Chevron Land Development Company and URS Corporation, from complying with all other applicable federal, state, and local regulations and permits. Departure from the approval conditions without prior written permission from EPA may result in the commencement of proceedings to revoke this approval, and/or an enforcement action. Nothing in this approval bars EPA from imposing penalties for violations of this approval, for violations of other applicable TSCA PCB requirements, or for activities not covered under this approval.

We look forward to assisting you with the implementation of cleanup procedures at the site. Please call Nathan Dadap at (415) 972-3654 if you have any questions concerning this approval.

Sincerely,



Jeff Scott, Director  
Waste Management Division

Enclosure:

Email Message dated February 8, 2013: *"PCBs: Birch Hills Golf Course Site, Brea, CA  
– Agreements Reached on February 6, 2013"*

cc w/ Enclosure (e-mail only):

Trevor Black, Chevron

Garrick Jauregui, Chevron

Jerome Zimmerle, Jr., URS

Steven T. Speer, OCHCA

Kamron Saremi, SARWQCB

Carmen Santos, EPA R9